

# EXHIBIT 3



# Buffalo Field Office

Final Supplemental Environmental Impact Statement and Proposed Resource Management Plan Amendment





# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Buffalo Field Office  
1425 Fort Street,  
Buffalo, Wyoming 82834  
[www.blm.gov/wy/](http://www.blm.gov/wy/)



Dear Reader:

Enclosed is the Proposed Resource Management Plan Amendment (RMPA)/Final Supplemental Environmental Impact Statement (FSEIS). The Proposed RMPA/FSEIS was prepared by the Bureau of Land Management (BLM) in consultation with various government agencies and organizations, taking into account public comments received during this planning effort. The purpose of the Proposed RMPA is to amend the 2015 Buffalo Field Office RMP to provide additional land use planning-level analysis specifically regarding coal, oil, and gas and to determine lands to be made available for coal leasing in the Buffalo Field Office. The need for action is to respond to a United States District Court, District of Montana, opinion and order (*Western Organization of Resource Councils, et al. v. BLM*). The Proposed RMPA would replace decisions for coal resource leasing availability in the 2015 Buffalo Field Office RMP/Record of Decision.

Pursuant to BLM's planning regulations at 43 CFR 1610.5-2, any person who participated in the planning process for this Proposed RMPA and has an interest which is or may be adversely affected by the planning decisions may protest approval of the planning decisions contained therein. The Proposed RMPA/FSEIS is open for a 30-day protest period beginning October 4, 2019.

The regulations specify the required elements of your protest. Take care to document all relevant facts. As much as possible, reference or cite the planning documents or available planning records (e.g. meeting minutes or summaries, correspondence, etc.).

Instructions for filing a protest with the Director of the BLM regarding the Proposed RMP Amendment and Final EIS may be found online at <https://www.blm.gov/programs/planning-and-nepa/public-participation/filing-a-plan-protest> and at 43 CFR 1610.5-2. All protests must be in writing and mailed to the appropriate address, as set forth below, or submitted electronically through the BLM ePlanning project website. Protests submitted electronically by any means other than the ePlanning project website protest section will be invalid unless a protest is also submitted in hard copy. Protests submitted by fax will also be invalid unless also submitted either through ePlanning project website protest section or in hard copy.



All protests must be in writing and mailed to one of the following addresses:

Regular Mail:

Director (210)  
Attn: Protest Coordinator  
P.O. Box 71383  
Washington, D.C. 20024-1383

Overnight Delivery:

Director (210)  
Attn: Protest Coordinator  
20 M Street SE, Room 2134LM  
Washington, D.C. 20003

**All protests must be received on or before November 4, 2019.**

Before including your address, phone number, email address, or other personal identifying information in your protest, be advised that your entire protest – including your personal identifying information – may be made publicly available at any time. While you can ask us in your protest to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

The BLM Director will make every attempt to promptly render a decision on each protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the BLM Director shall be the final decision of the Department of the Interior on each protest. Responses to protest issues will be compiled and formalized in a Director's Protest Resolution Report made available following issuance of the decisions. Upon resolution of all land use plan protests, the BLM will issue a Record of Decision (ROD). The ROD will be available to all parties at <https://go.usa.gov/xP6S3>.

Sincerely,

A handwritten signature in blue ink that reads "Todd D. Yeager". The signature is written in a cursive, slightly slanted style.

Todd D. Yeager  
Buffalo Field Manager  
Bureau of Land Management

**Draft Supplemental Environmental Impact Statement and  
Potential Resource Management Plan Amendment  
Buffalo Field Office, Wyoming**

Responsible Agency: United States Department of the Interior  
Bureau of Land Management

Type of Action: Administrative (X) Legislative ( )

Document Status: Draft ( ) Final (X)

**Abstract:** This final supplemental environmental impact statement (SEIS) and potential Resource Management Plan Amendment (RMPA) augments analysis for the 2015 Buffalo Field Office Approved Resource Management Plan (RMP). In it, the Bureau of Land Management Buffalo Field Office analyzed a new reduced coal alternative, supplemented the analysis of coal, oil, and gas downstream emissions, and provided justification for the time horizons chosen for analyzing global warming potential. The potential RMPA is limited to amending the coal leasing availability decision from the 2015 Approved RMP.

The Bureau of Land Management is the lead agency for this final SEIS/RMPA, with 12 cooperating agencies initially participating in the plan development: the Campbell County Commission, Johnson County Commission, Sheridan County Commission, Campbell County Conservation District, Wyoming State Historic Preservation Office, Wyoming Office of the Governor, Wyoming Department of Agriculture, Wyoming Department of Environmental Quality, Wyoming Game and Fish Department, United States Environmental Protection Agency (EPA) Region 8, the Office of Surface Mining, Reclamation, and Enforcement, and the United States Fish and Wildlife Service.

In this final SEIS/RMPA the BLM analyzed two alternatives. Alternative A, the no action alternative, continues management decision for coal leasing availability, with updated data on which the 2015 Proposed RMP/Final EIS was based, and an updated reasonably foreseeable development scenario. Alternative B would modify the management decision for coal leasing availability under the 2015 Proposed RMP/Final EIS, with an updated economic analysis and coal screens. Planning issues addressed leasable minerals, greenhouse gases, climate change, biological resources, and economics.

The BLM Field Manager recommends a modified Alternative B as the Proposed RMP Amendment for allocating BLM administered coal within the Buffalo Field Office. BLM added 39,784 acres as acceptable for further consideration for leasing to Alternative B. This will ensure flexibility for mining in the most efficient manner such as providing options for locating infrastructure in a manner that promotes the sensible use of the resource. The additional acreage was analyzed within the Alternative A CDPA.

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# Executive Summary

## ES.1 INTRODUCTION

The US Department of the Interior (DOI), Bureau of Land Management (BLM) has prepared this supplemental environmental impact statement (SEIS) and potential resource management plan amendment (RMPA) for the BLM Buffalo Field Office (BFO). It was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); Council on Environmental Quality regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500–1508); BLM NEPA regulations (43 CFR 46); the Federal Land Policy and Management Act (FLPMA) of 1976 (43 US Code [USC] 1701 et seq.); requirements of the BLM's NEPA Handbook, H-1790-1 (BLM 2008a); and the BLM's Land Use Planning Handbook, H-1601-1 (BLM 2005a).

The BLM prepared this SEIS/RMPA to respond to the US District Court for the District of Montana court order (*Western Organization of Resource Councils et al. v. BLM*). The District Court deemed inadequate the decisions related to the amount of coal available for leasing and the direct, indirect, and cumulative impacts from fossil fuel development in the 2015 Proposed RMP/Final EIS and Record of Decision (ROD). It ordered the BLM to complete a remedial NEPA analysis for the RMP. Through this SEIS/RMPA, the BLM will analyze an alternative that would decrease the amount of coal available for leasing, would consider climate change impacts of coal leasing, and would conduct new coal screening. It also would analyze the environmental consequences of downstream fossil fuel combustion,<sup>1</sup> including global warming potential over 20-year and 100-year time horizons.

The approved SEIS/RMPA could amend the 2015 Proposed RMP/Final EIS, as amended, concerning the coal allocation decisions. Information about the SEIS/RMPA can be obtained on the project website, <https://go.usa.gov/xP6S3>. The BFO completed the 2015 Proposed RMP/Final EIS in September 2015; they amended it in 2019, based on Greater Sage-Grouse management revisions. It provides management guidance and direction for approximately 800,000 acres of BLM-administered surface land and 4.7-million acres of BLM-administered mineral estate in Campbell, Johnson, and Sheridan Counties in north-central Wyoming. BLM management applies only to public lands, meaning those lands where the BLM has management responsibility for either the surface or the subsurface estate. The decision area is BLM-administered federal coal in the BFO. This is approximately 4.7 million acres of subsurface federal mineral coal estate for which the BLM has the authority to determine availability. **Figure ES-1** is a map of the decision area.

## ES.2 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN AMENDMENT

The purpose of this SEIS is to provide additional analysis for land use planning specifically regarding analysis for coal, oil, and gas in the BFO and to determine the lands to be made available for coal leasing. To support analysis in the SEIS/RMPA and subsequent decision-making, the BLM has conducted new coal screening, in accordance with 43 CFR 3420.1-4.

This SEIS/RMPA is needed in order to accomplish the following:

- Consider an alternative that would reduce the amount of recoverable coal and consider climate change impacts, in order to make a reasoned decision on the amount of recoverable coal made available

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<sup>1</sup> Combustion of coal, oil, or gas at a location different from the place of production or development.

- Supplement the analysis of the environmental consequences of downstream combustion of coal, oil, and gas open to development
- Justify the time horizon of the estimated global warming potential impacts—that is, 20-year or 100-year—and acknowledge the evolving science in this area

### ES.3 SCOPING

The formal scoping period began with publication of the Notice of Intent (NOI) in the *Federal Register* on November 28, 2018. The BLM provided the NOI for public consideration at a public scoping meeting in Gillette, Wyoming, on December 19, 2018. The BLM posted it on the BFO SEIS/RMPA project website, <https://go.usa.gov/xP6S3>. The period during which the public could submit scoping comments ended December 28, 2018.

The BFO received 37 unique submissions, with 278 comments, categorized into eight issue categories. Most comments received were for resource-specific issues—coal, oil and gas, air quality and climate change and economic issues, best available information/baseline data, and the range of alternatives. Detailed information can be found in the scoping report on the BFO SEIS/RMPA ePlanning website, <https://go.usa.gov/xP6S3>.

The BLM engaged with federal, tribal, state, and local governments as part of this SEIS/RMPA. The BLM sent letters to eligible agencies and tribes inviting them to be cooperating agencies and to assist with the document. In the tribal letters the BLM also asked if the tribes wanted to initiate formal government-to-government consultation. The BLM held a cooperating agency meeting before the public scoping meeting, which took place on December 19, 2018.

### ES.4 ISSUES

Table 2-2 in the Buffalo Field Office Supplemental EIS and RMPA Scoping Report (BLM 2019) shows the number of comments by specific resource or resource use. Approximately 33 percent of the resources and resource use comments were related to climate change, 14 percent were related to oil and gas, and 12 percent were related to the social cost of carbon.

### ES.5 PLANNING CRITERIA

Planning criteria guide development of the SEIS by defining the decision space. In 40 CFR 1610.4-2(b), the government states that the “Planning criteria will generally be based upon applicable law, Director and State Director guidance, the results of public participation, and coordination with any cooperating agencies and other Federal agencies, State and local governments, and federally recognized Indian tribes.”

Planning criteria represent the overarching factors used to resolve issues and develop alternatives. The planning criteria considered in the development of this document are as follows:

- Addresses BLM-administered surface lands and subsurface mineral estate
- Supplements the 2015 Proposed RMP/Final EIS by providing additional analysis in response to a US District Court order
- Uses a collaborative and multi-jurisdictional approach to determine the desired future condition of public lands
- Complies with NEPA, FLPMA, and other applicable laws, executive orders, regulations, and policy
- Recognizes valid existing rights
- Does not change existing planning decisions that are still valid

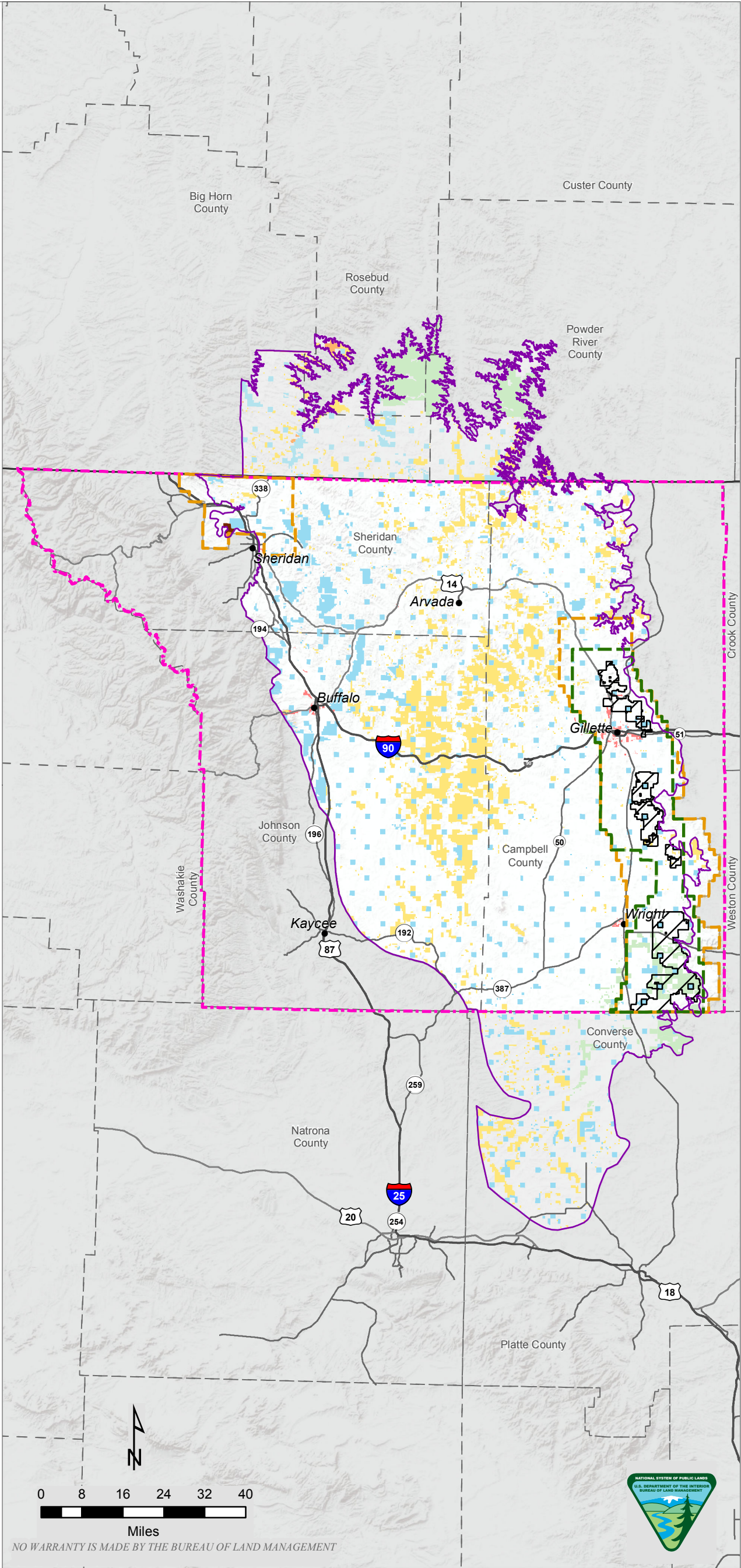


Decision Area

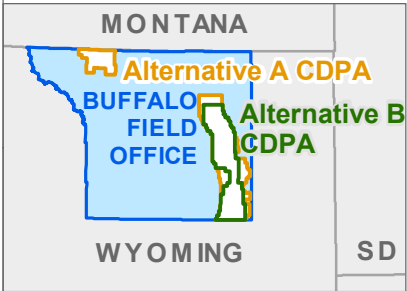
- Powder River Basin coal region
- Buffalo Field Office
- Alternative A CDPA
- Alternative B CDPA
- RFD area
- Forest Service National Grasslands
- Bureau of Land Management
- Other federal
- Local government
- State
- Private

Surface Administration in the Alternative A CDPA	
Campbell County	Acres
Bureau of Land Management (BLM)	24,693
Local Government	5,366
National Grasslands	66,855
Private	658,497
State	50,181
Sheridan County	Acres
Bureau of Land Management (BLM)	3,953
Department of Defense	2,837
Local Government	745
Private	138,066
State	17,909

Surface Administration in the Alternative B CDPA	
Campbell County	Acres
Bureau of Land Management (BLM)	4,963
Local Government	5,367
National Grasslands	51,712
Private	498,523
State	35,731



Source: BLM GIS 2019



## ES.6 MANAGEMENT ALTERNATIVES

Planning challenges identified through public scoping and the court order helped the ID Team identify key planning issues to be addressed in the SEIS/RMPA. Based on internal and external scoping, the BLM identified and developed two alternatives. **Table ES-I**, below, shows a comparison of alternatives.

The BLM updated the resource data for Alternative A (the No Action Alternative), conducted new screening for Alternative B (**Appendix A**), and updated the reasonably foreseeable development scenario (**Appendix B**) for both alternatives.

**Table ES-I**  
**Alternatives Summary and Coal Acceptability for Leasing**

Alternative	Acres Acceptable
Alternative A: No Action Alternative	686,896
Alternative B	455,467
Proposed Plan	495,251

Source: BLM GIS 2019

### ES.6.1 Alternative A: No Action Alternative

For Alternative A, the BLM brought forward all management decisions that prevented coal development in the 2015 Proposed RMP/Final EIS. In addition, the BLM used information from the 2001 coal screening process (see Appendix D of the 2001 RMP Update, BLM 2001), the coal development potential area (CDPA), and updated data to determine a baseline for coal availability.

### ES.6.2 Alternative B

Under Alternative B, the BLM updated all the coal screens. The BLM refined the CDPA, based on coal quality and stripping ratios (cost to produce) and current economic forecasts, to reduce the overall area acceptable for further consideration for coal leasing (**Table ES-I**).

### ES.6.3 Proposed Plan

The BLM Field Manager recommends a modified Alternative B as the Proposed RMP Amendment for allocating BLM administered coal within the Buffalo Field Office. BLM added 39,784 acres to Alternative B to ensure flexibility for mining in the most efficient manner such as providing options for locating infrastructure in a manner that promotes the sensible use of the resource. The overall acreage acceptable for leasing under the Proposed Plan is 495,251 acres which is less than Alternative A. The additional acreage was analyzed within the Alternative A CDPA.

## ES.7 ENVIRONMENTAL CONSEQUENCES

The purpose of the environmental consequences analysis in this SEIS/RMPA is to determine the potential for significant impacts of the federal action on lands considered acceptable for further consideration for coal leasing. The Council on Environmental Quality regulations for implementing NEPA state that the human environment is interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment (40 CFR 1508.14). The federal action is the BLM's selection of an alternative that the BLM BFO will base future land use actions related to coal leasing availability.

This SEIS/RMPA is in response to the US District Court's court order. Resources eliminated from impacts analysis are included in **Table I-3** of **Chapter I**; resources carried forward for analysis are included in **Chapter 3**. It objectively evaluates the likely direct, indirect, and cumulative impacts on the human and



natural environment in terms of environmental, social, and economic consequences that are projected to occur from implementing the alternatives. A summary of impacts for each resource is in **Table ES-2**.

**Table ES-2**  
**Impacts Summary for Resources Carried Forward**

Resources Brought Forward for Analysis	Impacts Common to all Alternatives
Air resources, including Greenhouse Gas and Climate Change	<ul style="list-style-type: none"> <li>• Production, transportation, and downstream combustion of federal coal would produce an estimated 398.9 million metric tons of carbon dioxide equivalents (MMT CO<sub>2</sub>e) annually based on 20-year global warming potentials. This represents approximately 6.2 percent of national emissions and 0.77 percent of global emissions. For the 100-year global warming potential, emissions are estimated at 368.2 MMT CO<sub>2</sub>e annually. This represents approximately 5.7 percent of national emissions and 0.71 percent of global emissions.</li> <li>• Production and downstream combustion of federal oil and federal conventional and coalbed natural gas would produce an estimated 3.2 MMT CO<sub>2</sub>e annually for the 20-year global warming potential. This represents approximately 0.048 percent of national emissions and 0.0006 percent of global emissions. For the 100-year global warming potential, emissions are estimated at 2.9 MMT CO<sub>2</sub>e annually. This represents approximately 0.044 percent of national emissions and 0.0005 percent of global emissions.</li> <li>• Cumulative annual average emissions (federal and nonfederal sources and other major sources in the planning area) would be 555.8 MMT CO<sub>2</sub>e and 535.6 MMT CO<sub>2</sub>e, respectively, using the 20-year and 100-year time horizon global warming potentials. Cumulative annual average emissions over the plan period would be between approximately 1.8 percent and 0.7 percent of global emissions under different future global representative concentration scenarios and would contribute, in part, to climate change impacts.</li> </ul>
Economic considerations	<ul style="list-style-type: none"> <li>• Attitudes, values, and beliefs tied to local economic opportunities and employment would continue to be supported by coal development. They would continue to manifest in civic pride and community cohesion. Based on recent production volumes per worker at the 12 coal mines, federal coal production projected in the RFD is forecast to support 3,413 coal jobs and \$391.3 million in direct labor income on annual average over the next 20 years. The indirect and induced employment stimulated by production in the coal industry is projected to support another 5,300 jobs and \$343.5 million in labor income across Campbell, Converse, Crook, Johnson, Natrona, Sheridan and Weston Counties.</li> <li>• Extraction of coal under the RFD would continue to support local attitudes, values, and beliefs associated with mineral revenues and funding for public services. Revenues levied by, and disbursed to, state and local governments would continue to fund infrastructure and public services, which supports quality of life locally and throughout the state. Leasing and production of federal coal in the BFO is projected to generate millions of dollars of federal, state, and local government revenues each year.</li> <li>• The satisfaction and well-being of people with attitudes, values, and beliefs, tied with the quality of biological and physical resources, could be affected by the coal development on wildlife, water, and GHG emissions.</li> </ul>



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Resources Brought Forward for Analysis	Impacts Common to all Alternatives
Biological resources (Unsuitability Criteria #9, 11, 12, 14, and 15)	<ul style="list-style-type: none"><li>• There is no critical habitat or habitat of essential value for threatened or endangered species. If there were potential for federally listed species in a coal project site, appropriate surveys for them and their suitable habitat would be made. If any were identified, the BLM would begin ESA Section 7 consultation. This would ensure that coal mining would not jeopardize threatened and endangered species at the project level.</li><li>• Site-specific surveys for each lease area and appropriate perimeters would be part of the mine permitting process if the tracts are leased. This would include appropriate surveys for BLM special status species, coordination with state and federal wildlife agencies, and creation of a mining plan, which could include site-specific mitigation and habitat restoration.</li></ul>

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Source: BLM GIS 2019